Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-30 are pending in the application, with 1, 14, 16, 18, 21, and 30 being the independent claims. Claims 17, 19, and 27 are sought to be cancelled without prejudice to or disclaimer of the subject matter therein. Claims 1, 2, 4-14, 16, 18, and 21 are amended. New claims 28-30 are sought to be added. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 112

On page 2 of the Office Action, claims 2-13 were rejected under 35 U.S.C. § 112, fourth paragraph, because "these claims do not incorporate all of the limitations of the claims to which they refer." Accordingly, Applicants have amended claims 2 and 4-13 to overcome the rejection, and to correct antecedent basis issues where present.

For example, claim 2, as amended, is reproduced below:

> 2.   The method of claim 1, wherein step (3a) is performed and steps (3b) and (3c) are not performed, wherein step (3a) comprises the steps of:
> (i)   creating a modification event representative of said data object; and
> (ii)   sending said modification event to said entity.

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As shown above, claim 2 does not contradict claim 1. Claim 1 recites "comprising one or more of steps (a)-(c)," meaning that any combination of claim elements (a), (b), and (c) can be performed. Claim 2 further limits claim 1, reciting that a specific combination of claim elements (a), (b), and (c) are performed, namely claim element (a), and that claim elements (b) and (c) are not performed. Thus, claim 2 further limits claim 1 (Claim 2 also further limits step (a) with sub-steps (i) and (ii)). Thus, Applicants assert that claim 2 overcomes the rejection for at least these reasons, as does claim 3 which depends from claim 2. Furthermore, Applicants assert that claims 4-12 overcome the rejection for reasons similar to claim 2, with regard to their own features. Applicants assert that original claim 13 was not in contradiction with claim 1, as it recited that a specific combination of claim elements (a), (b), and (c) is performed, namely all three of claim elements (a), (b), and (c). Claim 13 is amended above merely to correct antecedent basis issues caused by amendment of claim 1.

Thus, Applicants respectfully request that the rejection of claims 2-13 under 35 U.S.C. § 112, fourth paragraph, be reconsidered and withdrawn.

Rejections under 35 U.S.C. § 102

On page 2 of the Office Action, claims 1-27 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,862,325 to Reed *et al.* (hereinafter Reed). Applicants respectfully traverse the rejection, and request that it be withdrawn.

Technical differences exist between Reed and the claimed embodiments of the present invention. Claim 1, as amended, recites:

> 1.   A method for delivering information to an entity, comprising the steps of:

    (1) identifying a data object to be delivered to
the entity;

    (2) maintaining state information on behalf of
the entity; and

    (3) delivering said data object to the entity in a
form consistent with the maintained state information,
comprising one or more of steps (a)-(c):

      (a) pushing said data object to the
entity;

      (b) transferring said data object to the
entity during a sync operation; and

      (c) transferring said data object to the
entity in response to a request from said entity while said
entity is surfing.

Reed does not teach all of these features of claim 1. For example, Reed does not

teach maintaining state information on behalf of the entity, and delivering said data

object to the entity in a form consistent with the maintained state information. Thus, the

embodiment of claim 1 is different from Reed.

For example, Reed states:

> In one aspect of the present invention, a
> communications system is used to coordinate
> communications between providers and consumers.
> Provider computers transfer information stored in the
> provider computer through a communications network to a
> consumer computer. The information includes processes
> for updating the transferred information in the consumer
> computer when the information in provider computer has
> changed. *For "push" processes, the provider computer*
> *maintains address data necessary to transfer updated*
> *information to various consumers. For "pull" processes,*
> *the consumer computer uses information transferred from*
> *the provider to access a location where the provider*
> *information is stored to determine whether it has been*
> *updated and to retrieve it if necessary.*

Thus, for example, Reed states that for "push" processes, the provider computer

maintains address data necessary to transfer updated information, and for "pull"

processes, the consumer computer uses information transferred from the provider.

Nowhere does Reed even teach maintaining state information on behalf of the entity, and thus does not teach delivering said data object to the entity in a form consistent with the maintained state information. Even if, *arguendo*, Reed's maintenance of address data is construed to be state information, it cannot be said that Reed teaches or suggests "delivering said data object to the entity in a form consistent with the maintained state information," as claimed. Thus, Reed does not teach each and every element of independent claim 1.

Accordingly, Applicants respectfully submit that independent claim 1 is patentable over Reed, for at least these reasons. Independent claims 14, 16, 18, and 21, and new independent claim 28 are also patentable over Reed at least for reasons similar to those described above, and further with respect to their own features. Furthermore, claims 2-13 and new claim 28, which depend from claim 1, claim 15, which depends from claim 14, claim 20, which depends from claim 18, and claims 22-26 and new claim 29, which depend from claim 21, are also patentable over Reed for at least these reasons, and further in view of their own features.

Thus, Applicants respectfully request that the rejection be reconsidered and withdrawn.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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